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ZENITH EDUCATION GROUP

**Report of Independent Monitor
March 30, 2015**

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<p>ATTORNEY-CLIENT PRIVILEGED REPORT. DISCLOSURE PERMITTED ONLY TO THE UNITED STATES DEPARTMENT OF EDUCATION UNDER LIMITED WAIVER OF PRIVILEGE.</p>
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Time Period: This report reflects the Monitor's activities from February 4, 2015 through March 20, 2015.

1. Marketing Materials

- a. Monthly report to include description of marketing materials reviewed to date

Status: Monitor has received an initial batch of marketing materials from Zenith. These materials include TV media, Internet media, webpages for Everest.edu and WyoTech.edu, Newspaper creative, Print Media (Yellow pages, Displays, Flyers), and Email Campaigns.

Monitor has developed a review template and method for reviewing marketing materials for compliance with federal and state laws and for required disclosures. Monitor has begun reviewing marketing materials and will update the Monitor's Report upon completion of any category of materials.

2. Admissions/Recruitment

- a. Employees

- Monthly report to include description of documents reviewed related to training, supervision, compensation of employees performing admissions and recruitment functions
- Monthly review to describe sampling of calls and emails to and from prospective students to Zenith related to Admissions and Recruiting

- b. Third Parties/Lead Generators

- Monthly review to identify materials reviewed related to third parties or lead generators

Status: The Monitor has received training materials related to admissions recruitment, Vendor Agreements, and Enrollment Agreements. The Monitor has developed a review template and method for reviewing admissions and recruitment materials for compliance with federal and state laws and for required disclosures. The Monitor has begun reviewing admissions and recruitment materials and will update the Monitor's Report upon completion of any category of materials.

3. Oversight Over Required Disclosures

- a. Completion Rates – Monthly report to include description of materials reviewed related to date of completion
- c. Placement Rates – Monthly reporting regarding placement rates
- c. Accreditation Status – One time reporting in monthly report regarding agreed disclosure in Enrollment Agreement

Status: Monitor has not begun reviewing Completion or Placement Rates.

Monitor has reviewed a sample Everest Enrollment Agreement and has confirmed that the following language is contained in a black box titled “Accreditation Status Disclosure.”:

Except in limited circumstances, courses and credits from the School will not transfer to other schools, and a degree from the School will not be honored for admission to an advanced degree program.

The text of this disclosure is in 12 point font and is two point sizes larger than any other text on page 6 of the Enrollment Agreement.

4. Student Choice

- a. Summary of Student Choice implementation in Monthly report for first two months

Status: See attached Student Choice Report

5. Tuition Reduction Program/Zenith Graduation Scholarship

- a. One time summary of implementation of Tuition Reduction program
- b. One time summary of implementation of Zenith Graduation Scholarship

Status: The Monitor has reviewed training material for the Tuition Reduction and Graduation Scholarship Program. The Monitor has also reviewed the Graduation Scholarship Application. The Monitor will update the Monitor’s Report upon completion of the review of implementation of these programs.

6. Zenith Grant Program/Institutional Loans

- a. One time summary of implementation and materials for Zenith Grant Program

Status: The Monitor has reviewed training material for the Zenith Grant Program. The Monitor will update the Monitor's Report upon completion of the review of the implementation of this program.

SECTION 4: STUDENT CHOICE REPORT

Time Period: Zenith implemented the Student Choice Period from February 4, 2015 through February 24, 2015 and provided information about the Student Choice Implementation through March 20, 2015. This report reflects the Monitor's activities from February 4, 2015 through March 20, 2015.

Student Choice Monitor Assessment

I) Assessment of Zenith Student Choice (SC) Implementation Efforts

A) Monitor Obligations

- 1) Monitor has conducted an assessment of Zenith's efforts to conduct a meeting between a Zenith representative and every student who has the Student Choice option to discuss their choice.
- 2) Monitor has conducted an assessment of Zenith efforts to obtain a written acknowledgement from each student that such meeting has occurred, applicable options were discussed and that the student understands the options presented.

B) Scope. Monitor has reviewed the SC Process and Results, more fully described in attached Appendix A, including the following contact attempts and successful contacts made by Zenith to Impacted Students across multiple modes of contact:

- 1) Online & Ground. Initial email sent to all students regarding various issues related to Zenith's purchase of Everest schools, including SC.
- 2) Online & Ground. Initial email with SC video sent to 11,019 Impacted Students (9448 online; 1571 ground campus).
- 3) Online
 - (a) Telephone Attempts. 26,224 telephone contacts attempted to online students by Zenith Advisors. Of these attempts, 6327 resulted in successful voice to voice contact with students.
 - (b) Email Attempts. 19,897 follow-up SC Contact Attempt emails to online students, if voice to voice contact was attempted but not made.
 - (c) eCollege Message. Posting of pop-up eCollege message clicked by 7,372 Impacted Students. The eCollege message prompted

Impacted Students to go to the Document Center to review SC materials and allowed student to select a bypass to go to class without going to the Document Center. The eCollege message would re-appear for Impacted Students every time such student logged in until the student clicked the button to go to the Document Center.

- (d) Online Successful Contact Email. 6,327 follow-up emails sent to any online Impacted Student after a successful voice to voice contact was made.
 - (e) Online Reminder Telephone Contacts. Telephone contact attempts were made to students who filled out a Meeting Acknowledgement Form (MAF) 1-3 days prior to the expiration of the 7 day SC choice period, depending on whether the MAF expiration was on a weekend.
- 4) Ground
- (a) Group and individual showings of SC Video. Ground Campus personnel conducted individual or group sessions to ensure that students viewed the SC introduction video
 - (b) In Person Meetings. Ground Campus personnel made attempts to contact Impacted Students who had not participated in SC meetings via telephone, email, or in person on campus.
- 5) Online & Ground. Final Notice emails sent to 3,570 Impacted Students who had not completed either an MAF or SC Form as of February 17, 2014, indicating that if no selection was made, student would be continued in student's current academic program.
- 6) Escalation/Override Requests. A process was adopted for students who made an error on their SC Form, asked to reconsider or change their decision, or requested additional time to make a decision.

	Requests	Approved	Denied
Online	320	278	42
Ground	19	19	0

- (a) All online requests where students had completed an MAF prior to 2/24 were approved and students were allowed to reset their election or receive additional time.

C) 

[illegible]

	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]			
		[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[illegible]

D) Findings

- 1) Zenith has met or exceeded its obligation to make reasonable best efforts to conduct a meeting between a Zenith representative and every student who has the Student Choice option to discuss their choice.
- 2) Zenith has met or exceeded its obligation to make reasonable best efforts to obtain a written acknowledgement from each student that such meeting has occurred, applicable options were discussed and that the student understands the options presented.

II) SC Written Materials Review

- A) Scope. Monitor has reviewed the training materials, presentations, scripts, student acknowledgement and choice forms, for online and ground campuses provided by Zenith.

B) Findings

- 1) The materials reviewed by the Monitor present a fair and balanced presentation of the SC options.
- 2) The materials set forth the conditions that triggered the SC options.
- 3) Training and tracking emphasized making contact with the Impacted Student and fairly presenting SC options.
 - (a) Advisors making SC contacts were not provided with results of SC elections to ensure that the fairness of the outreach process, not the outcome, was emphasized.
 - (b) The training materials reiterate that the student should be only one making the decision.
- 4) The materials appropriately guide Zenith employees and students through the options available to them.
 - (a) The materials are divided into Placement, Teach Out and California Resident in order to ensure that the student is presented with the options as available to the students.

- (b) The materials clearly explain the choices available to the Impacted Students and the effects of each option.
- 5) The materials and training are designed to allow Impacted Students the opportunity to ask questions, and speak with Academic Advisors and Student Finance to understand the choices.
- 6) The materials advise students of the 7 day deadline to make a decision and the default provisions, including the overall SC period deadline of February 24, 2015. Student's whose deadline fell on a holiday or on a day when the campus was closed due to weather were given an additional day to complete and return the SC form.
- 7) Zenith reviewed and modified the materials as needed to address issues which arose during Student Choice period, including:
 - (a) Updates to talking points regarding voucher to address Students not understanding that they would be dropped from classes immediately to allow processing of drop-calculation for voucher purpose.
 - (b) Additions to FAQs for Zenith personnel conducting the SC implementation.
 - (c) Regular feedback to online staff conducting SC initiative.
 - (d) Implementation of feedback and suggestions from the Monitor.

III) Campus Visits

A) Scope of Review

- 1) Monitor has conducted site visits to select campuses based on the recommendation of NORC to observe SC meetings or interview students regarding SC process. Visits were divided into visits during the SC Period and visits after the period was finished. Campuses were selected based on size of impacted population, percentage of students electing to continue, percentage of students contacted, and regional administrative structure.

Campuses Visited include the following (location and region)

Campus	Region
Aurora	Mountain
Brandon	Florida East
Colorado Springs	Mountain
Dallas	North Texas
Ft. Worth	North Texas
Henderson	Mountain
Jacksonville	Florida Central
Melbourne	Florida Central
Orlando North	Florida East
Orlando South	Florida East
Pittsburgh	Mid-Atlantic
Tampa	Florida East

- B) Campus Visits during SC Period
- 1) Scope and Process
- (a) The Monitor observed live SC meetings.
- (b) The Monitor interviewed students without the presence of administrators or faculty in groups after class. The Monitor was introduced as an Independent Compliance Monitor. The students interviewed were not notified in advance, and were interviewed based on their availability on the date of the visit without disruption to class time.
- (c) Monitor interviewed Campus Presidents as well as other faculty and staff involved in the SC process.
- 2) Findings: Observed SC Meetings
- (a) Limitations. The Monitor notes that it was not possible to view the meetings without being present in the room. This likely limited any deviation from a strictly neutral presentation by the administrators.
- (b) Findings
- (i) Subject to the Limitation described above, during the SC meetings, Monitor observed that the administrators did not express any bias or preference. The advisors followed the

talking points and emphasized that the decision was up to the student.

- (ii) The Monitor was able to observe SC meetings where students indicated they intended to withdraw.
- (iii) In some cases, the Monitor observed meetings where students had follow up meeting with Academic Advisor or Student Finance. Otherwise the Monitor interviewed Academic and Finance advisors regarding the areas inquiry of by students.
 - Questions to Academic Advisors dealt primarily with what other programs were offered and what credits would transfer.
 - Questions to Finance primarily involved understanding who would receive the refund. Many students initially thought the funds would be remitted to the student even in the case of loans.

3) Findings: Student Interviews

- (a) Limitations. Students interviewed during this phase would mostly have either selected to continue or would have not made an election. If the student had selected withdrawal or voucher, the student would have been dropped immediately and would not be on campus for surprise interviews.
- (b) Findings
 - (i) Students interviewed were able to articulate the three choices presented to them (Continue, Voucher, Withdrawal).
 - (ii) Students interviewed were able to explain in reasonable detail the financial aspects of withdrawal, including application of tuition paid to another Zenith Program.
 - (iii) Students were able to explain in reasonable detail the refund process, including that the funds would be paid to lender unless student had paid tuition.

- (iv) In some instances, high percentage of students electing to continue were attributable to high VA population because of requirements for VA students to repay stipends and/or complete their education in a fixed time period.
- C) Campus Visits after SC Period
 - 1) Process
 - (a) The Monitor interviewed Campus officials who had conducted SC interviews.
 - (b) The Monitor interviewed students without the presence of administrators or faculty in groups after class. The Monitor was introduced as an Independent Compliance Monitor. The students interviewed were not notified in advance, and were interviewed based on their availability on the date of the visit without disruption to class time.
 - 2) Findings
 - (a) Limitations. Students interviewed during this phase would have all elected to continue in their current program. If the student had selected withdrawal or voucher, the student would have been dropped immediately and would not be on campus for surprise interviews.
 - (b) Findings
 - (i) Students interviewed were able to articulate the three choices presented to them (Continue, Voucher, Withdrawal).
 - (ii) Students interviewed were able to explain in reasonable detail the financial aspects of withdrawal, including application of tuition paid to another Zenith Program.
 - (iii) Students were able to explain in reasonable detail the refund process, including that funds would be paid to lender unless student had paid tuition.
 - (iv) The Monitor found one issue affecting multiple students in the Criminal Justice Associate program at one Campus. Students were not advised that of the availability of the Criminal Justice Bachelors program under the voucher

option. Zenith investigated and discovered that at three campuses (Melbourne, Orange Park and Jacksonville), CCI had instructed campus presidents in January not to enroll any additional students in the Criminal Justice Bachelor Program. As such, this program was not presented as an option in the SC implementation. Zenith personnel were instructed to advise the students that had elected to continue of the availability of the Criminal Justice Bachelors program. If any students wished to change their choice, they would be allowed to do so under the escalation process.

IV) SC Live and Recorded Call Review

A) Scope of Review

1) Method of review

(a) The Monitor has listened to a sample of live and recorded telephone conversations between students and Zenith employees related to SC.

(i) Limitation. A very small number of calls were live monitored while observing the advisor making the call at their station.

(b) Most live-monitored calls were monitored from a remote location which does not allow the Zenith advisor conducting the call to know he or she is being monitored.

(c) Other calls were monitored via recording from Zenith's existing call recording systems.

2) Selection of calls reviewed

(a) Number of Calls reviewed. The Monitor, based on the recommendation of NORC, reviewed 10% of the total number of student contacts made (694 calls).

(b) No search or voice recognition capability was available to select the calls. Selection was made according to a matrix developed by NORC based on the calls made or received by each Zenith advisor.

- (c) The goal of the monitoring was to sample across the following areas of variability, as permissible from Zenith systems in place:
 - (i) Variability based on Incoming vs Outgoing Calls.
 - (ii) Variability based on Dialer (LiveVox) vs dialed calls.
 - (iii) Variability based on Initial vs Follow Up Calls.
 - (iv) Variability on Advisor.

B) Findings.

- 1) The Monitor found no systemic or patterns of bias in the calls reviewed.
- 2) The advisors on initial calls followed the full Talking Points provided.
- 3) The advisors emphasized that the decision was up to the student.
- 4) The advisors stopped to ask questions to see if the Student understood or had questions about each option.
- 5) The advisors generally were able to answer most questions about the process and the SC options.
- 6) The Monitor found isolated instances of advisors whose discussions with students may have expressed personal views that were not part of the talking points provided.
 - (a) In each instance, the advisor nonetheless reiterated the emphasis in the script that the student alone should make the decision based on what was right for the student.
 - (b) These instances were isolated and did not rise to the level of misrepresentation or coercion.

- 7) The Monitor found the following issue that may have affected multiple students related to the timing of the documents. The Monitor advised Zenith that a student who tried to complete the SC form on the 7th day after execution of the MAF found that the SC form was no longer in the document center. Zenith determined that the issue was that the form automatically expired at the same time of day as the MAF form completion (i.e., if MAF was completed at 2:30 pm Thursday, the SC Form would expire at 2:30 pm on the following Thursday). In order to allow students the full 7th day to complete the SC form, Zenith reset the SC Forms to expire on the 8th day after the execution of the MAF.

Appendix A Student Choice Process and Results

I) Impacted Student Population

Combined PL & TO	
All Campuses	Total Student Count
OL only	9448
Ground Only	1571
Total	11019

Impacted Campuses

PL Cap Programs	TO Programs	CA Resident
Campus	Campus	Campus
Aurora	Aurora	Blairsville
Brandon	Brandon	Daytona Beach
Colorado Springs	Chesapeake	Laramie
Dallas	Colorado Springs	Online - Everest Brandon
Dearborn	Dallas	Online - Everest Colorado Springs
Henderson	Dallas Mid Cities	Online - Everest Orlando South
Jacksonville	Everett Everest	Online - Everest Pompano
Lakeland	Fort Worth South	Online - Everest University Tempe
Largo	Henderson	
Melbourne	Jacksonville	
Newport News	Lakeland	
Online - Everest Brandon	Largo	
Online - Everest Colorado Springs	Melbourne	
Online - Everest Orlando South	Newport News	
Online - Everest Pompano	Norcross	
Online - Everest University Tempe	Online - Everest Brandon	
Orlando North	Online - Everest Colorado Springs	
Orlando South	Online - Everest Orlando South	
Pittsburgh	Online - Everest Pompano	
Pompano Beach	Online - Everest University Tempe	
Portland	Orange Park	
Springfield	Orlando North	
Tacoma	Orlando South	
Tampa	Pittsburgh	
Thornton	Pompano Beach	
	Portland	

	Tacoma	
	Tampa	
	Thornton	
	Totals	
	Portland	

II) SC Options

A) Students were divided up into the following categories

1) Placement (PL) was offered for the following programs

Accounting AAA
Business AAS
Accounting AS
Applied Management AS
Applied Management BS
Business AS
Paralegal AS
Paralegal BS
Paralegal AAS
Business Administration AAS
Business Office Administration (D)
Business Administration MBA
Business BS
Accounting BS
Business Administration ASB
Paralegal ASB
Business Accounting

2) Teach Out (TO) was offered for the following programs

Criminal Justice AAS
Criminal Justice as
Criminal Investigation AS
Homeland Security AS
Criminal Justice ASB

- a. Reentry (RE) materials were created for students in TO programs seeking reentry.

- b. California Resident (CA) materials were created to offer California residents of online and ground campuses the opportunity to Continue or Withdraw.

B) PL and TO Students

- 1) Continue. Allowed Students to continue in current program.
- 2) Voucher. Allowed Impacted Students to apply costs paid toward current program to another Zenith Program. Required students to be dropped from current term without credit for current term classes. Students required to re-enroll within 12 months. Loan to own laptops to be returned unless Student is re-enrolling in next term.
- 3) Withdraw. Allowed Impacted Students to withdraw from program. Withdrawal effective immediately. Zenith to perform withdrawal calculation to repay non-grant funds to either lender or student, as applicable. Transcripts of credits still available, other than current term. Loan to own laptop to be returned.

- C) Re-entry Students. A separate set of SC documents was created for students who had previously been enrolled and who were trying to re-enroll in an Everest program that fell within the SC Initiative. For students in Re-entry Teach Out, students were given the same three options as current students.

III) CA Residents. As the Zenith purchase did not include any California schools, a separate set of documents was created to allow California resident students the following options.

- A) Continue. Allowed Students to continue in current program.
- B) Withdraw. Allowed Impacted Students to withdraw from program. Withdrawal effective immediately. Zenith to perform withdrawal calculation to repay non-grant funds to either lender or student, as applicable. Transcripts of credits still available, other than current term. Loan to own laptop to be returned.

IV) Training Materials

- A) Zenith developed training materials to educate the staff implementing the SC initiative including the following, which were reviewed by the Monitor:
 - 1) Talking Points.
 - 2) Process Plans, Job Aids, and Process Flow documents.

- 3) Training Presentations.
- 4) FAQs, including Finance FAQs, VA Specific FAQs, California FAQs.
- 5) Internal quality control checklists for personnel supervising staff implementing SC initiative.

V) SC Contact Attempts.

A) Contact Attempts. Attempts to contact Impacted Students were made via email, phone, in person, or through their student portals.

1) Online

(a) Welcome Email

Date Sent: February 2, 2015.

General welcome letter includes paragraph about SC implementation to begin.

(b) Email Contact with Video Link

Date Sent: February 3, 2015

Sent to: All Impacted Students

Impacted Students for all online programs were sent an email letter from ECMC President D. Hawn and Interim President Zenith Education Group T. Stovall. The letter explained the SC initiative and included a video link to a video that could be viewed explaining the three student choice options and the reason for the initiative. The email also contained a link to the Zenith website. The email directed student to email questions or concerns to studentservicesinfo@cci.edu and indicated a staff member would respond within 24 hours.

(c) eCollege Message

Dates Posted: February 9 to February 24, 2014

Posted for: This message was tied to the student IDs only for Impacted Students. The eCollege is the webpage through which online students sign in to attend classes. The eCollege site requires a log in by the student. Once the Impacted Student signed in, and prior to their ability to go to class, a message appeared. The message indicated that there are documents regarding SC that required review, provided a link to the SC video, and provided the toll free number for questions (directed to Student Services and Student Finance). The message instructed students to select the button/link labeled “Go to the Document Center” as soon as possible to log in and review the documents as soon as possible. The

student was then given the option to Go To Class (Red Button) or Go To Document Center (Green Button).

The eCollege message remained active (for the time period between February 9 and February 24) until the Student selected the Green Button to go to the Document Center. The Student could bypass the eCollege message by clicking the Red “Go to Class” button, but the message would re-appear at the student’s next log in. For students that clicked the Green “Go to Document Center” button, but did not complete the SC forms, Zenith re-enabled the eCollege message.

Data regarding eCollege message

Total Clicks	7,385	
Subtotal - Number of students clicking		7,372
Total bypass clicks (Red Go to Class Button)	2,688	
Subtotal active students		2,482
Subtotal inactive students		204

(d) Telephone Contact Attempts

Total telephone contact Attempts	26,224
Subtotal to active students with no SC election as of 3/4	7,575
Subtotal to inactive students	971

- (i) February 4 – 10. Dialed Student contact attempts by Success Coaches and Student Finance.

From February 4 to the morning of February 6, all Impacted Students were assigned to one of 93 Student Services Success Coaches during this period. The Success Coaches were the same individuals assigned to these students as part of their enrollment. The Success Coaches were assigned to call those students within their cohort who were Impacted Students to conduct the SC meetings via telephone.

Starting on February 5, Student Finance Advisors were also assigned Impacted Students to call during this period to conduct SC meetings via telephone. Student Finance representatives are not routinely assigned to Students during their enrollment.

- (ii) February 10 – 18. Telephone dialer campaigns through LiveVox
Dates of Campaigns.

On the above dates, the names and telephone numbers of the Impacted Students for whom there had been no SC Contact were fed into a dialer.

Advisors from Student Services and Student Finance were selected to call these student to conduct SC meetings via telephone.

(e) Email Contact Attempts

For every voice to voice contact that was attempted and not made, the Impacted Students were simultaneously sent an email from the advisor who attempted the contact stating that the advisor has been trying to reach the student regarding the program he or she is enrolled in. The email also indicted that the student should have received an email recently regarding the sale of his or her school. The student was given the contact information for the advisor, as well as the email studentservicesinfo@cci.edu.

Total email contact attempts	26,224
Subtotal to active students with no SC election as of 3/4	7,575
Subtotal to inactive students	971

(f) SC Contact Made Follow up communications

- (i) A Student Choice Contact was permitted to be logged for the student if during the telephone meeting all the relevant (3 options for PL and TO; 2 for CA residents) options were discussed.
- (ii) Email Follow Up. Once an advisor made a Student Choice Contact with the Student, a follow up email was simultaneously sent to the student.
- (iii) Telephone follow Up. For students who filled out an MAF, follow up calls were attempted 1-3 days prior to the expiration of the 7 day SC choice period, depending on if the MAF expiration was on a weekend.

(g) Final Notice Emails.

Date Sent: February 17, 2015
Sent to: All Impacted Students with no forms completed (No MAF and No SC Form).
Total number of Final Notice Emails Sent: 3570

(2) Ground Campus

(a) Welcome Email

Date Sent: February 2, 2015.
General welcome letter includes paragraph about SC implementation to begin.

(b) Email Contact with Video Link

Date Sent: February 3, 2015

Sent to: All Impacted Students

Impacted Students for all online programs were sent an email letter from ECMC President D. Hawn and Interim President Zenith Education Group T. Stovall. The letter explained the SC initiative and included a video link to a video that could be viewed explaining the three student choice options and the reason for the initiative. The email also contained a link to the Zenith website. Email indicated that student would be contacted by an Academic Advisor.

(c) Group meetings to show video Scheduled by each Campus

(d) Individual Student Choice Meeting

(i) Conducted by Campus Presidents, Academic Deans, Program Directors.

(ii) At this meeting students were given the SC letter and the Meeting Acknowledgment Form.

(iii) Students given 7 days to complete SC Form.

B) SC Contacts Made

(1) Online

(a) Telephone conversation documented in CampusVue System.

(b) Contact made only permitted if Zenith representative is able to finish reviewing all relevant SC options available.

(2) Ground

(a) Required face to face meeting. Meeting documented in CampusVue System.

(b) Telephone meeting permitted if student unable to come to campus.

VI) Steps after SC Contact

A) Meeting Acknowledgement Form. Student asked to complete MAF which sets forth the relevant SC options (continue, voucher, withdraw/refund).

Online versions: Found in Student Document Center

Ground versions: Handed to Student, with attached Student Choice Form

Distribution: All Impacted Students

MAF explained the SC Initiative. MAF explained the reasons for the SC initiative. The letter provided the toll free contact number for Everest online and directed students to contact either Student Services or Student Finance regarding their questions. The letter explained that the students would be given 7 days after the meeting to think about their options before informing Zenith of a decision. The letter described the 7 day deadline to make a selection and indicated that students who did not submit a SC form within 7 days would be considered a continuing student and remain active in the student's current program.

There were variations on the letter for Placement, TeachOut and Re-entry which contained similar language.

B) Optional Meetings with Academic Advisors and/or Student Finance

- 1) Academic Advising Form. The Academic Advising Form contains guidelines to allow the Academic Advisor to walk the student through their election.
- 2) Student Finance Talking Points. The Finance Talking Points contained guidelines to allow Student Finance advisors to explain the financial aspects of the voucher and withdrawal options.

C) SC Form. Online and Ground forms are the same. Requires Students to make election between Continue, Voucher or Withdrawal.

- 1) Online documents in Document Center Required to be completed within 7 days of MAF if MAF completed.
- 2) Ground Campus on paper. Required to be personally delivered, scanned or mailed, postmarked by 2-24-15.

VII) Student Reconsideration and Escalation

- A) A process was adopted for students who made an error on their SC Form, asked to reconsider or change their decision, or request additional time to make a decision.

	Requests	Approved	Denied
Online	320	278	42
Ground	19	19	0

- (1) All online requests where students had completed an MAF prior to 2/24 were approved and students were allowed to reset their election or receive additional time.
- (2) Online requests where students did not complete MAF were approved only in 5 instances which involved IT issues.
- (3) Example of Reasons given for escalation approved

After additional consideration of the options, student request to change decision, within 7 days
Approved prior to 2/24, CVue script auto change to no longer needed, need to remove auto cont activity and reset docs
CA Student who did not receive CA Docs but SC docs; Canceled SC docs and added CA docs
Didn't fully understand her options at first and request to change decision, within 7 days
Felt rushed to make a choice, but not the choice she wants
Incorrect selection, within 7 days
Missed deadline; Requested additional time to make selection
Misunderstood and request to change decision, within 7 days
Misunderstood the options and request to change decision, within 7 days
Request to change decision due to not having 36 credit hours for the BA degree, within 7 days
Request to change decision, enrolled in another campus, within 7 days
Request to change decision, within 7 days
Requested additional time to make selection
Signed docs without a conversation with SC or SF and wants a different choice, within 7 days
Student selected the wrong choice by accident, request to change decision, within 7 days
Student signed Ack form on the 21st, did not have the choice form in portal on the 28th. Approved appeal request.
Technical Issues with completing the form
Viewed the form from her phone an accidentally selected a choice request to reset so she can make her choice via her computer, within 7 days

VIII) Special Populations

1. Veterans Administration (VA) Students.

FAQs, updated FAQs and additional materials were prepared to allow Advisors to answer question from VA Students. VA students often receive a housing stipend, which the students would have been required to pay back upon withdrawal. The housing stipend would not have been available during any missed terms under a voucher. Additionally these students often must complete their programs during a set time period (i.e. 36 months).

2. California Residents

In addition to the SC Impacted Students, Zenith offered California residents at ground and online campuses the option to continue or withdraw. Separate materials were created for California residents.

CA Resident	
Campus	Total Student Count
Ground	107
Online	362
Total	469

CA Resident	Total Student Count	Meeting Acknowledgement			
Campus		# Contacted	Non SC WD*	Not Contacted	% Not Contacted
Blairsville	3	2	0	1	33.3%
Daytona Beach	7	7	0	0	0.0%
Ground	97	93	0	4	4.1%
Online - Everest Brandon	28	22	0	6	21.4%
Online - Everest Colorado Springs	48	41	0	7	14.6%
Online - Everest Orlando South	156	116	10	30	19.2%
Online - Everest Pompano	8	5	1	2	25.0%
Online - Everest University Tempe	122	98	3	21	17.2%
Totals	469	384	14	71	15.1%

CA Resident	Student Choice Selection			
Campus	Continue	% of Choices Made	Refund	% of Choices Made
Blairsville	2	100.0%	0	0.0%
Daytona Beach	5	71.4%	2	28.6%
Ground	82	88.2%	11	11.8%
Online - Everest Brandon	13	72.2%	5	27.8%
Online - Everest Colorado Springs	30	81.1%	7	18.9%
Online - Everest Orlando South	62	63.9%	35	36.1%
Online - Everest Pompano	3	60.0%	2	40.0%
Online - Everest University Tempe	41	55.4%	33	44.6%
Totals	238	71.5%	95	28.5%